

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Forest Post Office
Forest, Louisiana 71242

Docket No. A2012-19

PUBLIC REPRESENTATIVE COMMENTS

(December 27, 2011)

On October 18, 2011 the Commission received an appeal from John L. Whorton (Petitioner Whorton). The Commission also received a letter from Shonya Driver (Petitioner Driver) on October 21, 2011. Petitioner Whorton is concerned about the affect of the closure on senior citizens, minorities and low-income citizens. He is also concerned about local farmers damaging rural mailboxes with large farm equipment. Petitioner Driver has a special needs child and is concerned about longer wait times and more people at other Post Offices. Petitioner Driver provides other cost savings suggestions to the Postal Service, including reducing advertising. Petitioner Whorton demonstrates that closing all small post offices will only save the Postal Service 0.7 percent of its operation budget.

The Postal Service responded to both Petitioners' concerns on December 13, 2011 in its Comments Regarding Appeal and in its Final Determination.¹ The Postal Service highlights the convenience of rural delivery for senior citizens and those who face special challenges because services will be available by the rural carrier at roadside mailboxes. Revised Postal Service Comments at 6. The Postal Service provides suggestions to Petitioner Wharton to minimize damage to mailboxes by local farmers or suggests getting a P.O. Box from the Oak Grove Post Office. *Id* at 7. Concerning economic savings, the Postal Service calculates that discontinuing the Forest Post Office will save an estimated \$74,542 annually. *Id* at 10. However, the

¹ The Final Determination (FD) can be found at Item No. 47 in the Administrative Record (AR).

Postal Service does not anticipate there being additional costs associated with replacement service. See AR Item No. 47.

The Postal Service filed little support of its claim that there will be no additional costs for alternative replacement service. AR No. 17 at 2. The fact that no additional costs are assumed likely inflates any economic benefit that the Postal Service will realize by closing this office. It also contradicts the Postal Service statements concerning the ease of access to roadside mailboxes. The Public Representative believes the Postal Service should provide a more reasonable estimate of the additional cost for alternative replacement services. However, the Public Representative recognizes that the costs of alternative replacement services are likely to be far less than \$74,542, and the closure of the Forest Post Office will still result in a net savings for the Postal Service.

Aside from concerns that the Postal Service will not realize the cost savings it estimates, the Public Representative finds that no persuasive argument has been presented which would prevent the Commission from affirming the Postal Service's determination to close the Forest Post Office. The Public Representative concludes that the Postal Service has followed applicable procedures, that the decision to close the Forest Post Office is neither arbitrary nor capricious, and that the Postal Service's decision is well supported. However, the Commission should continue to encourage the Postal Service to provide more accurate, consistent, and transparent economic savings estimates.

Respectfully Submitted,

Natalie R. Ward
Public Representative for
Docket No. A2012-19

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